

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

08/03/23

12:25 PM

I1702002

Order Instituting Investigation pursuant to Senate Bill 380 to determine the feasibility of minimizing or eliminating the use of the Aliso Canyon natural gas storage facility located in the County of Los Angeles while still maintaining energy and electric reliability for the region.

Investigation 17-02-002
(Filed February 9, 2017)

ISSAM NAJM NOTICE OF EX PARTE COMMUNICATION

Pursuant to Rule 8.4 of the Commission's Rules of Practice and Procedure (Rules), I, Issam Najm, hereby give timely notice of the following three *ex parte* communications in the above noted proceeding:

Meeting 1 – Tuesday August 1, 2023, from 2:00 pm to 2:30 pm, with Commissioner Karen Douglas chief of staff Ms. Kourtney Vaccaro and advisor Mr. Arnold Son.

Meeting 2 – Wednesday, August 2, 2023, from 11:00 am to 11:30 am, with Commissioner John Reynolds advisor Ms. Maria Sotero.

Meeting 3 – Wednesday, August 2, 2023, from 11:30 am to 12:00 pm, with Commission President Alice Reynolds advisors: Ms. Kerry Fleisher and Ms. Karolina Maslanka.

I requested the meetings and I was the only non-PUC person in attendance. The topic of discussion in all three meetings was the Southern California Gas Company and San Diego Gas & Electric Company's joint petition for modification of Decision 21-11-008. The meeting will be conducted via Teams and WEBEX.

I began each meeting by thanking the PUC staff for allowing me to discuss this important matter with them. I also introduced myself and explained that I am participating as a party in the I17.02.002 proceeding as an individual representing the hopes and aspirations of the community gravely impacted by the Aliso Canyon gas facility.

I strongly stressed to Commission staff that the Joint Petition for Modification (PfM) of Decision 21-11-008 is asking the Commission to turn a blind eye to everything that has happened at Aliso Canyon by removing all restrictions on the gas storage volume and use at the facility. Raising the volume, yet again, at the facility is a slap in the face to a community that has been

patiently waiting for the closure of this facility as requested by former Governor Brown, Governor Newsom, Los Angeles County Supervisors, and Los Angeles City Council. This PfM is also in stark contrast to the staff proposal that is supposed to begin reducing the volume at Aliso this coming year until its closure by 2027.

I stressed the SoCalGas and SDG&E falsely claim in the PfM that the cost impact on customers could have been greatly mitigated had they had more gas in storage. I demonstrated in my May 30, 2023 reply¹ to SoCalGas & SDG&E's response to the ALJ Ruling that their own data on gas demand, storage, withdrawals and injections do not support their claim and show that additional storage would have had minimal impact on the cost to customers because the demand during the impacted period was far higher than the entire added volume between the current storage of 41 Bcf and the requested storage of 68.6 Bcf, and considering the fact that SoCalGas had plenty of gas still in storage in January. Yet, the PD took SoCalGas and SDG&E's false claims at face value, and completely dismissed the actual data analysis that I presented in my reply. The PD did not give my arguments and entire analysis any consideration. Even if it disagreed with it, it could have at least given me the courtesy of an explanation for the disagreement and what it finds to be incorrect in my analysis. Otherwise, what's the point of participating in a proceeding if all my arguments will simply be set aside as not worth reviewing?!

The simple way to eliminate cost pressure to core-customers is to implement the same strategy implemented by NW Natural as outlined in my May 30, 2023 reply which makes only annual adjustments to the gas rate and does not pass market cost fluctuations on to customer bills. SoCalGas already has a system in place to do that, and that's the Level Pay Plan (LPP), but customers have to know about it and have to opt-in to enroll in it. The PUC can take action now to have all core-customers enrolled in the LPP and have SoCalGas provide an opt-out option for those who do not wish to be in the program. This will completely eliminate the impact of market fluctuations on customers as I show in the actual data I presented in the May 30, 2023 reply.

I stressed that the underlying foundation of SB380, which is the reason this proceeding was undertaken in the first place, was the impact of the Aliso Canyon facility on the health and safety of the surrounding community as was painfully demonstrated by the blowout of 2015. Yet, the proceeding excludes the impact of the facility on the community from its deliberations. It is critical for the commission to understand that raising the volume at Aliso Canyon will indisputably result in greater harm to the community because this Facility releases toxic

¹ <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M510/K286/510286954.PDF>

chemicals into the air around the community on a continuous basis as long as it is in operation. This observation is made based on specific toxic chemical release data reported by the South Coast Air Quality Management District (AQMD) at their website.² I presented data from AQMD on the release of toxic chemicals from Aliso Canyon as recently as 2021. The presentation material is attached and discussed below.

There are dozens of toxic chemicals emitted from the facility on a daily basis as documented by the data obtained from AQMD. It is worth noting that these are data provided by SoCalGas to AQMD and represent ONLY the emissions from operating equipment that are listed in the permit, and do NOT include any fugitive emissions from the facility. The list includes chemicals known or suspected to cause cancer in humans, such as Benzene, Formaldehyde, TCE, methanol, and many others. All these chemicals are released next to a community with young families, children in elementary schools, and hiking trails used by thousands of Los Angeles County residents every year. For all this to be excluded from a proceeding triggered by concerns over the impact of a dangerous facility on a community is incomprehensible.

I implored the Commission to reject the PD and to stay the course with the staff proposal to eliminate the use of Aliso Canyon by 2027 and begin its implementation as soon as possible.

Dated: August 3, 2023

Respectfully Submitted,

/s/ Issam Najm
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² <https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=800128>

Why the Aliso Canyon Gas Facility Must be Closed

Issam Najm, Ph.D., P.E.
Porter Ranch Resident
& Party to CPUC Proceeding I.17-02-002
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Ex Parte Meetings with Advisors to
PUC President Alice Reynolds
PUC Commissioner John Reynolds
& PUC Commissioner Karen Douglas
August 1 & 2, 2023

October 23, 2015



Environmental Defense Fund

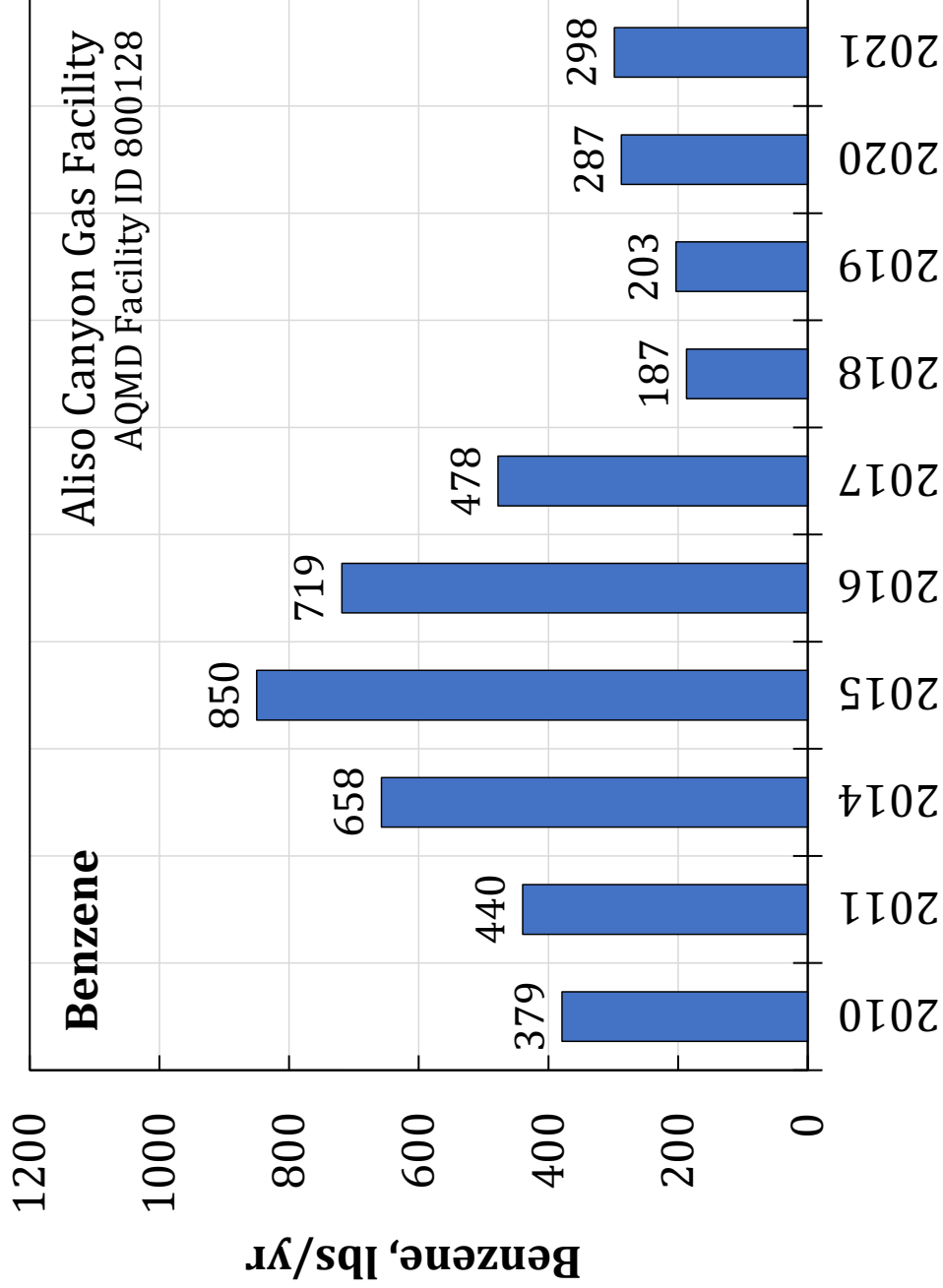
- ❖ The blowout of one well at Aliso Canyon left no doubt about what can happen (and what does happen) at a Gas storage field
- ❖ This field is within sight of a vibrant community with young families, elementary schools, and some of the last active hiking trails in the entire City of Los Angeles
- ❖ Not sure anyone can begin to imagine what 86 billion cubic feet of highly compressed gas is like
- ❖ SoCalGas lost control of the well for four months
- ❖ All the while, SoCalGas was telling everyone that “*methane and mercaptans have no long-term health effects*”.
- ❖ But what they were NOT telling anyone is that the invisible gas that is blowing out contains crude oil and a long list of toxic chemicals, of which they were totally aware.

The Myth



- ❖ There is this perception that the release of chemicals into the community stopped when the well was plugged in February 2016
- ❖ That is a myth, and you don't need to take my word for it
- ❖ Take it from the South Coast Air Quality Management District (AQMD)
- ❖ This facility releases toxic chemicals into the air that we breathe every day it operates, and all the data are on the AQMD website:
<https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=800128>
- ❖ These are on top of any “fugitive” emissions of toxins. These are just what is emitted by the operating equipment and components that are included in the AQMD operating permit for the facility

Benzene



“benzene is characterized as a known human carcinogen for all routes of exposure based upon convincing human evidence as well as supporting evidence from animal studies”

~USEPA

https://iris.epa.gov/static/pdfs/0276_summary.pdf

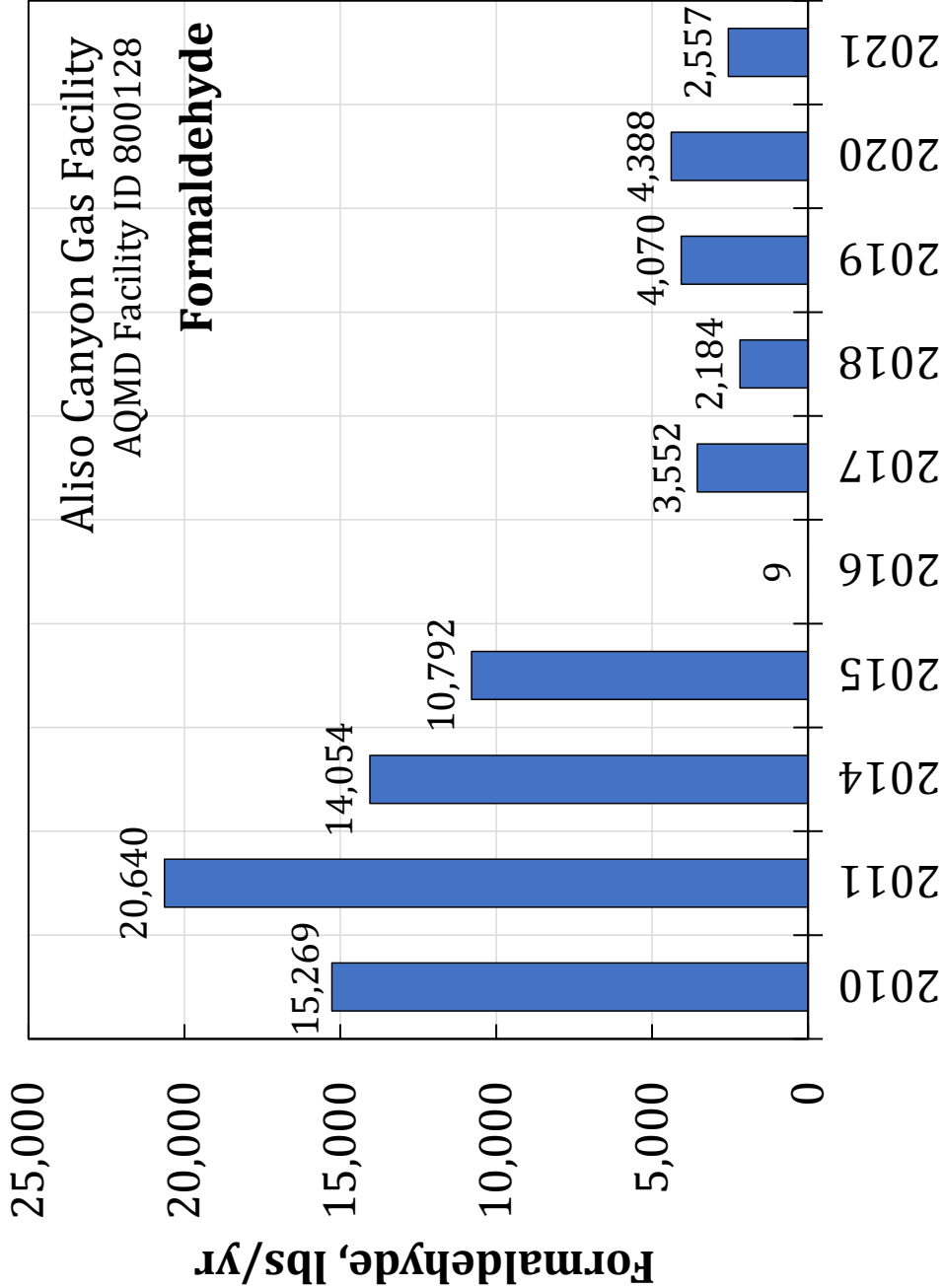
“Prolonged or repeated exposures have been associated with both blood cell proliferation and reduction in blood cell numbers due to bone marrow suppression, including peripheral lymphocytopenia, pancytopenia, and aplastic anemia.”

Children may be more sensitive to benzene because so many of their tissues are undergoing rapid cell division and differentiation for growth and development to stimulate and maintain growth.”

~OEHHHA

<https://oehha.ca.gov/media/downloads/cnr/appendixd1final.pdf>

Formaldehyde



“Formaldehyde – probable human carcinogen, based on limited evidence in humans, and sufficient evidence in animals. Human data include nine studies that show statistically significant associations between site-specific respiratory neoplasms and exposure to formaldehyde or formaldehyde-containing products.”

~USEPA

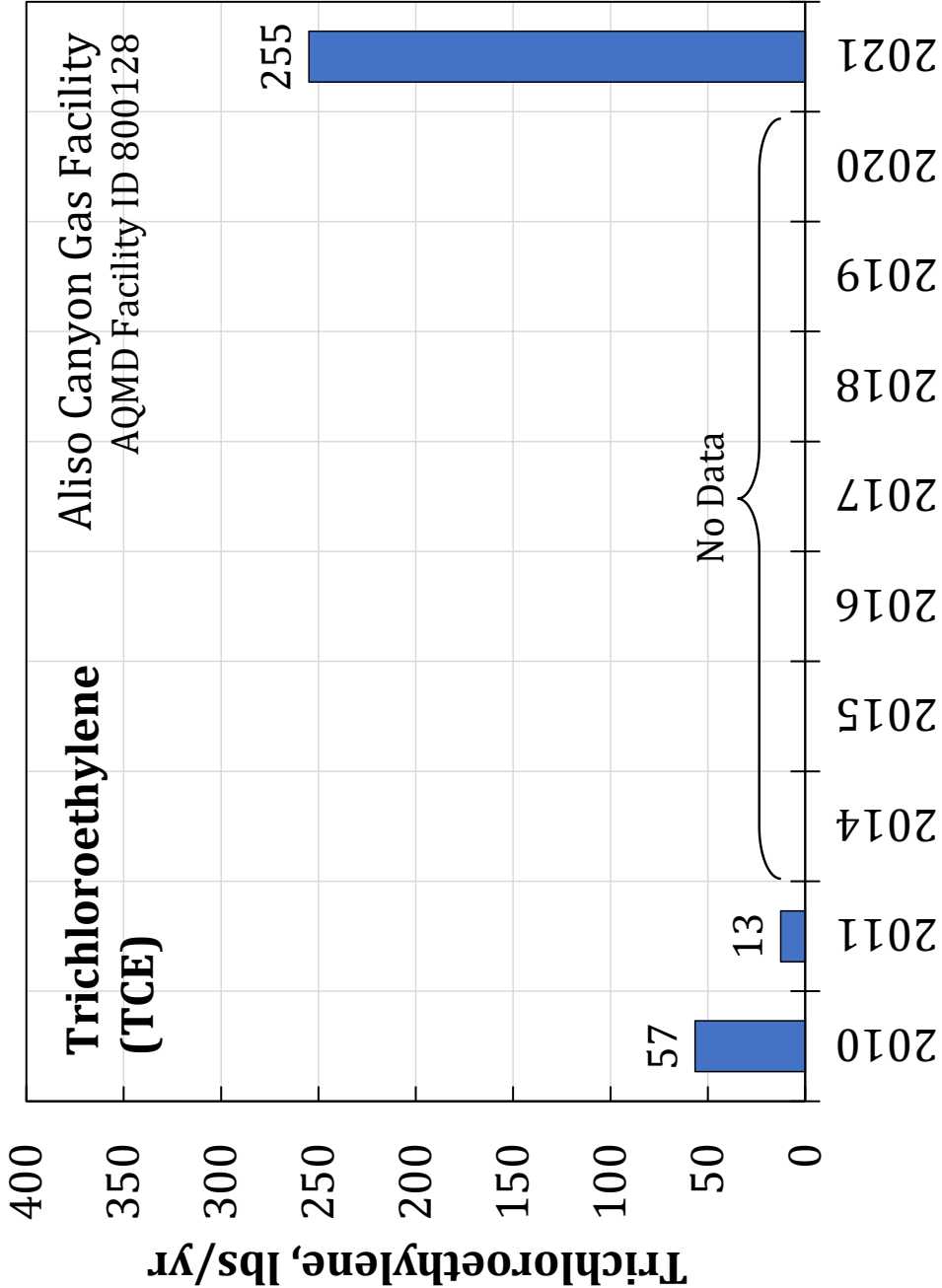
https://iris.epa.gov/static/pdfs/0419_summary.pdf

“Prolonged or repeated exposures have been associated with allergic sensitization, respiratory symptoms (coughing, wheezing, shortness of breath), histopathological changes in respiratory epithelium, and decrements in lung function. Children, especially those with diagnosed asthma, may be more likely to show impaired pulmonary function and symptoms than are adults following chronic exposure to formaldehyde.”

~OEHA

<https://oehha.ca.gov/media/downloads/cnr/appendixd1final.pdf>

Trichloroethylene (TCE)



“TCE is characterized as ‘carcinogenic to humans’ by all routes of exposure. This conclusion is based on convincing evidence of a causal association between TCE exposure in humans and kidney cancer.”

~USEPA

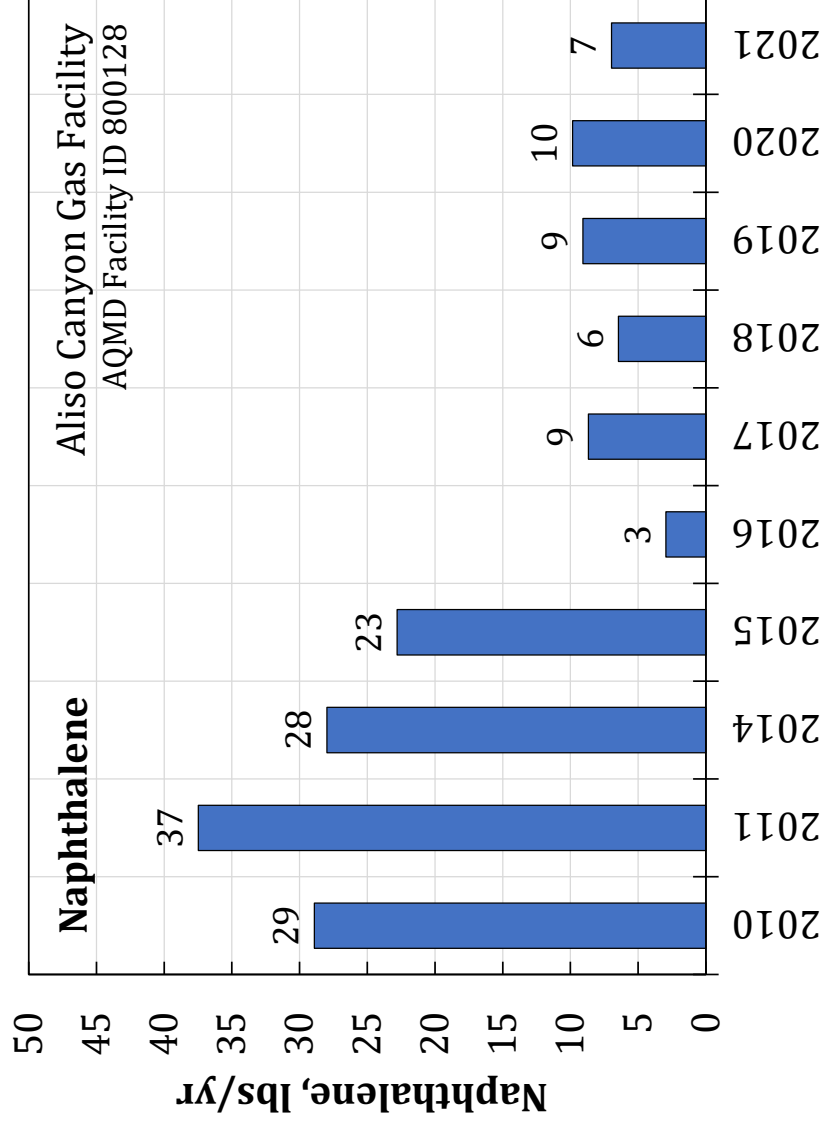
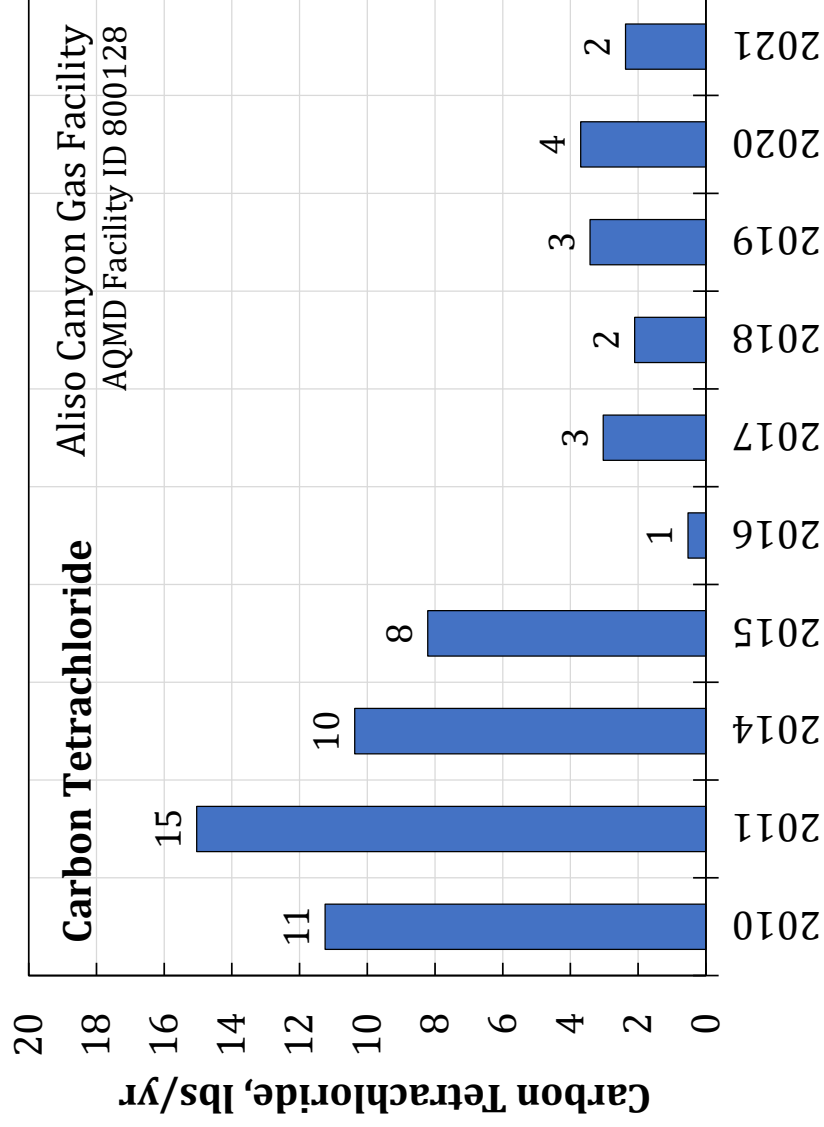
https://iris.epa.gov/static/pdfs/0199_summary.pdf

“Effective January 31, 2014, the Office of Environmental Health Hazard Assessment (OEHHA) is adding trichloroethylene to the list of chemicals known to the State to cause reproductive toxicity. The listing of trichloroethylene is based on formal identification by the U.S. Environmental Protection Agency (U.S. EPA), an authoritative body, that the chemical causes reproductive toxicity.”

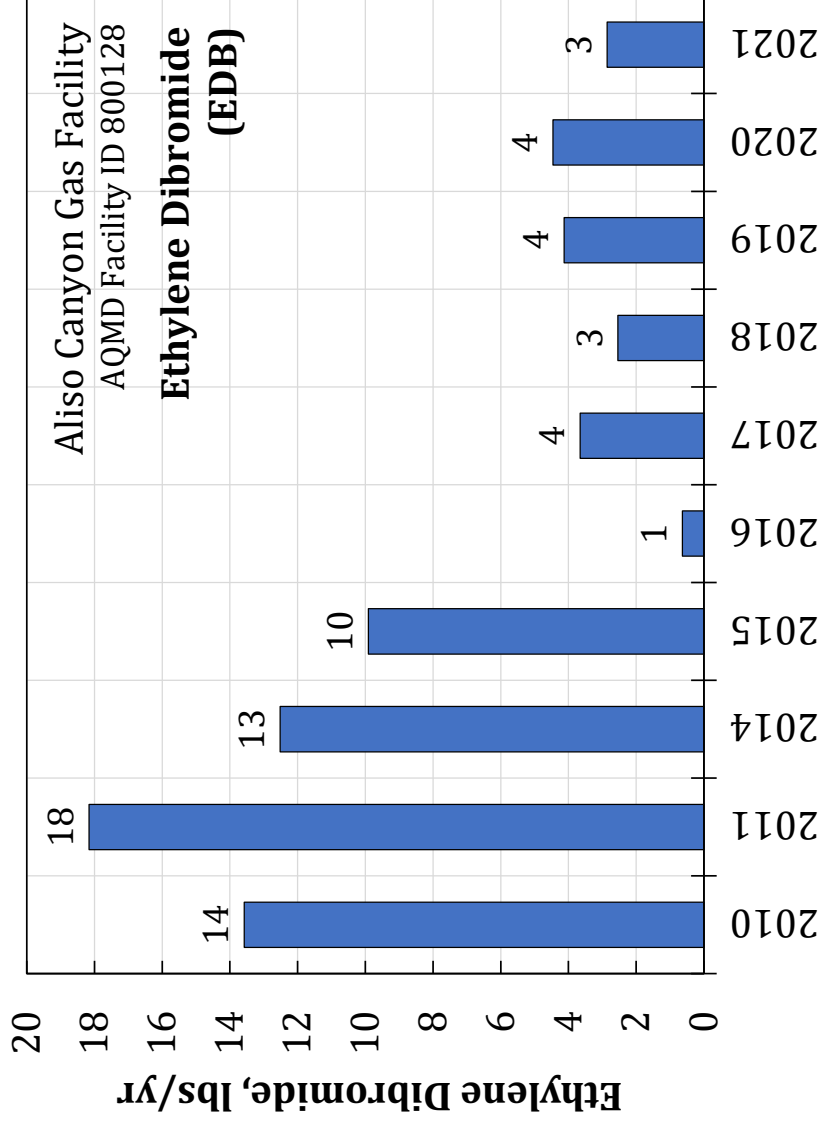
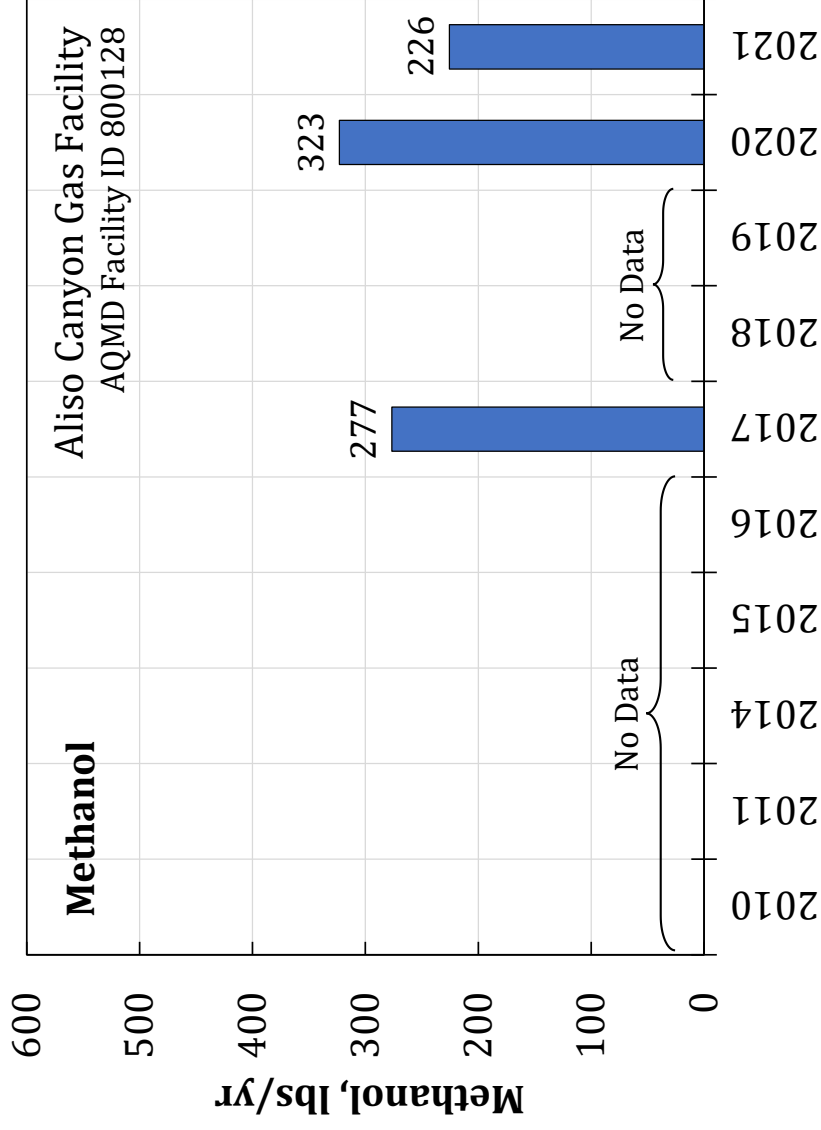
~OEHHA

<https://oehha.ca.gov/proposition-65/crnrr/chemical-listed-effective-january-31-2014-known-state-california-cause>

Carbon Tetrachloride & Naphthalene



Methanol & Ethylene Dibromide



Toxic Chemicals Emitted from Aliso Every Day

Formaldehyde	1,1,2,2-Tetrachloroethane	ME T-BUTYLETHER
Acetaldehyde	Methylene chloride	FLUORENE
HEXANE	Carbon tetrachloride	ACENAPHTHYLENE
Ammonia	1,1,2TRICLETHAN	o-Xylene
Acrolein	Dipropylene glycol monomethyl ether	Hydrochloric acid
Benzene	Chloroform	PYRENE
Trichloroethylene	1,2-Dichloropropane {Propylene dichloride}	Chlorine
Methanol	1,3-Dichloropropene	ACENAPHTHENE
Toluene	Copper	FLUORANTHENE
Diesel engine exhaust, particulate matter	2-Methyl naphthalene [PAH, POM]	PAHs, total, with components not reported
1,3-Butadiene	Styrene	Chrysene
Xylenes	1,2,4TRIMEBENZE	B[GHI] PERYLENE
Chlorodifluoromethane {Freon 22}	Ethylene dichloride	Benzo[e]pyrene [PAH, POM]
Naphthalene	Vinyl chloride	Lead (inorganic)
ETHYL BENZENE	M-XYLENE	Methyl ethyl ketone
Ethylene dibromide	PHENANTHRENE	Benzo[b]fluoranthene

<https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=800128>

Aliso MUST be Closed



Environmental Defense Fund

- ❖ The blowout of 2015 only exposed the dangers of this facility to the people of our community
- ❖ But the danger did not go away after the well was capped
- ❖ We are continually exposed to an invisible toxic plume of chemicals from this facility
- ❖ And SoCalGas wants you to turn a blind eye to it
- ❖ I KNOW you would not accept this for your children
- ❖ We are only asking the Commission to also not accept it for ours!

The Staff Proposal Closes Aliso by 2027

